

**AFFIDAVIT
of
SEAN McDERMOTT
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION**

I, Sean McDermott, being first duly sworn, do depose and state that:

INTRODUCTION AND BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with Facebook account #100042142160158 (the SUBJECT ACCOUNT), with vanity name “traye.connor”, which is stored at premises owned, maintained, controlled, or operated by META Platforms, Inc. (META), a company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A), to require META to disclose to the government records and other information in its possession, including the contents of communications, pertaining to the subscriber or customer associated with the SUBJECT ACCOUNT.

2. I am a Special Agent (“SA”) with the Federal Bureau of Investigation (FBI) and am assigned to the Jefferson City, Missouri Office. I have been an SA with the FBI for approximately nineteen (19) years. In the course of my career, I have participated in numerous investigations concerning violations of Title 18 United States Code. I am currently assigned to criminal investigations involving bank robberies. I have conducted and assisted with investigations involving social media accounts. I have been involved in the execution of search warrants to search social media accounts.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended

to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18 U.S.C. Sections 2113 and 924(c) have been committed by TRE JOSEPH CONNOR. There is also probable cause to search the SUBJECT ACCOUNT described in Attachment A for evidence of these crimes and items to be seized listed in Attachment B.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) and (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

6. Google Earth map showing some of the locations discussed herein is attached:

surveillance footage captured approximately neck-length dark hair protruding out from under the ski mask.

9. Exterior security camera footage was obtained from the Fairfield Inn, located at 3621 W. Truman Boulevard, across Truman Boulevard from RRCU. Prior to the RRCU robbery, footage showed CONNOR emerge from behind Samco Business Products (Samco), located at 3612 W. Truman Boulevard, west of RRCU, and approach the RRCU on foot from the east. Subsequent to the RRCU robbery, this security camera also recorded that CONNOR exited the side door of the bank, and ran westbound behind Samco.

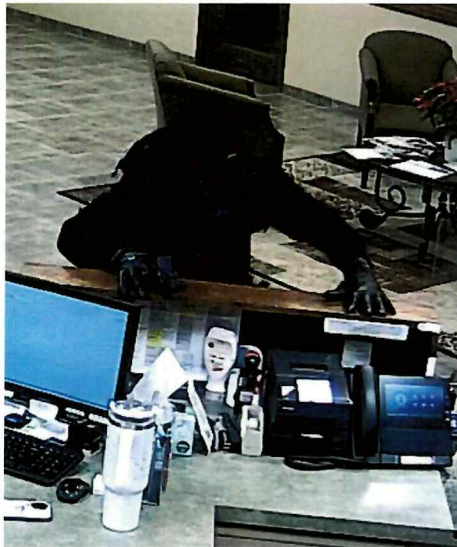
10. A Jefferson City Police Department (JCPD) K-9 Officer conducted a K-9 track with his K-9 partner. The K-9 track began behind Samco, and traveled westbound to a wooded tree line behind One For All Day Program, 3620 W. Truman Boulevard, Jefferson City, Missouri. Amador Avenue lies on the other side of these woods.

11. Exterior security camera footage was obtained from the Convenience Food Mart, 3714 W. Truman Boulevard, Jefferson City, Missouri. Prior to the robbery, this footage showed a black four-door sedan turning left from Ventura Avenue onto Amador Avenue at approximately 08:46:43. Subsequent to the robbery, this security camera also recorded a black four-door sedan, consistent in appearance with the aforementioned vehicle, turning right from Amador Avenue onto Ventura Avenue at approximately 09:00:43. This vehicle did not stop at the stop sign on Amador, and appeared to be missing a hubcap on the driver's front tire.

12. An exterior security camera mounted on an apartment building on Ventura Avenue recorded this vehicle turning left onto Candlelight Drive.

13. As mentioned previously, security camera footage obtained from RRCU showed CONNOR used a semi-automatic handgun, and wore a backpack, gloves, a mask, a hooded

sweatshirt and jogger pants, during the robbery. The following are still shots from the RRCU security camera footage showing the robber wearing/brandishing these items:



14. An Asset Protection Associate at Walmart, 724 West Stadium Boulevard, Jefferson City, Missouri, researched Walmart sales records and determined a pair of black “And1” brand jogger pants were purchased on January 16, 2023. Walmart security camera footage showed the

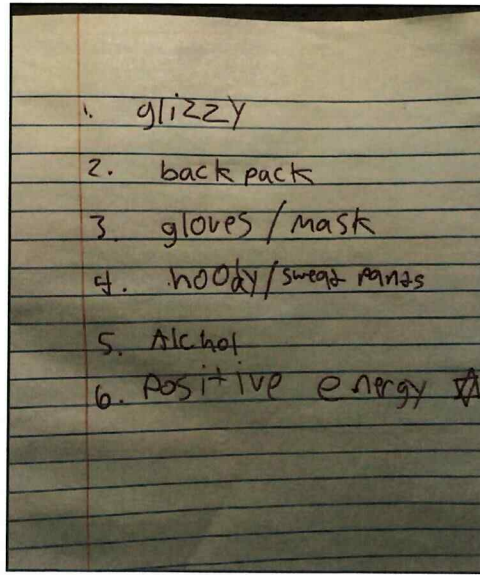
buyer of these pants was a white or light-skinned bearded black male whose build was consistent with CONNOR. The receipt for this purchase documented the buyer also purchased two pairs of men's shorts, a men's hoodie, and a black backpack with gold trim around the zipper.

15. Walmart security camera footage showed the buyer departed the Walmart parking lot driving a black Ford Five Hundred displaying Missouri license plate BF0-C6F. The driver's front tire of this vehicle was missing a hubcap.

16. JCPD Detective Jason Ambler viewed the Walmart surveillance video, and recognized the buyer as TRE JOSEPH CONNOR. Investigation revealed CONNOR lived in an apartment on Candlelight Drive.

17. Search Warrant 23-SW-03010-WJE was issued to Apple Inc. for information stored within an iCloud account associated to CONNOR. The results of this search warrant included a video of CONNOR in a boxing ring wearing black and white Nike shoes consistent with those worn by the robber seen on RRCU security camera footage. The caption of this video includes "connortre", and the Instagram logo oscillating with the Instagram reels icon, indicating this video was posted on the Instagram account with username "connortre". The video file was dated November 27, 2022, although that is not necessarily the date the video was taken and/or posted to Instagram.

18. The following image was seized from CONNOR's iCloud account:



19. This file for this image was dated January 16, 2023, the same day CONNOR purchased jogger pants, a hoodie, and a backpack at Walmart. Glizzy is a slang term for a gun.

20. A photograph posted on CONNOR's Facebook page on January 3, 2023 depicted him with long dark hair that was consistent with the robber's hair seen on RRCU security camera footage.

21. On February 2, 2023, a state search warrant was executed at CONNOR's residence, 3805 Candlelight Drive #B, Jefferson City, Missouri, by JCPD, with assistance from the FBI. During this search, an iPhone with a peach color case was found in the living room of the residence. CONNOR's mother believed this iPhone to belong to CONNOR.

22. Also located during the search was an empty shoebox labeled to have contained size 10.5 black and white Nike Air Zoom Pegasus 38 shoes, model number CW7356-002. An internet search for this model number yielded images of Nike shoes consistent with those worn by the robber seen on RRCU security camera footage.

23. Videos from CONNOR's Snapchat account dated January 22-23, 2023, one of which was narrated by CONNOR, showed the interior of a hotel room. A female was visible in some of these videos. Records obtained from The Broadway Columbia hotel, 1111 East Broadway, Columbia, Missouri, documented CONNOR paid \$231 cash to stay in suite 200 the night of January 22, 2023.

24. Investigation identified the female in the hotel video as Jada Ward. Law enforcement interviewed Ward, who reported she began dating CONNOR in approximately December 2022. On January 20, 2023, CONNOR asked Ward if she wanted to get a hotel that weekend. Ward agreed, and CONNOR rented a suite at a hotel in Columbia with a jacuzzi tub. CONNOR typically dressed tacky and wore baggy clothes and Walmart shorts, but when he picked Ward up to go to the hotel, he was wearing a new tie dye Jordan hoodie and new shoes. CONNOR brought a royal blue roller bag and a light blue tote bag to the hotel. Once inside the room, Ward noticed a large stack of cash in one of these bags. Some of the cash was wrapped in a white bank band. There was additional cash on top of the banded cash, and the entire stack was secured with a rubber band. The bills looked new and crisp. CONNOR claimed the cash was \$10,000 of \$50,000 he received from boxing. CONNOR did not let the cash out of his sight, and took it with him whenever he left the room. CONNOR gave Ward \$300 from this stack of cash to get her hair done.

25. Investigation revealed CONNOR had a total of two professional boxing matches. CONNOR's first fight was in Arnold, Missouri on April 16, 2022, and his second fight was on July 16, 2022, in Jefferson City, Missouri. CONNOR was listed as 5'-9" tall and fought in the super welterweight division (154 pounds). CONNOR had a professional record of one win and one loss, losing his second fight via technical knockout after he was injured.

26. Executive Director of the Missouri Office of Athletics Tim Lueckenhoff provided JCPD contracts for CONNOR's two professional fights. These contracts documented CONNOR was to earn 50 percent of the purse for his first fight, and received a \$900 advance. For his second fight, CONNOR was to be paid 35 percent of ticket sales, but had to deduct \$800 for his opponent's purse.

27. JCPD interviewed Mia Allen, the mother of CONNOR's son. Allen reported CONNOR telephoned her on January 19, 2023, which was unusual because they were not on good terms, and rarely spoke. Allen reported CONNOR was not involved in his son's life to the point he did not know his birthday. CONNOR inquired what size shoes his son wore. Allen gave CONNOR the shoe size, and he told her that he was going to buy some shoes for their son. Allen went to CONNOR's grandparent's house that evening and picked up a one pair of red and black pair Nikes and a pair of black Nike Air Jordan's for their son.

28. Research in the Missouri Uniform Law Enforcement System (MULES) revealed that the Missouri Department of Labor and Industrial Relations last reported wages paid to CONNOR in the third quarter of 2022 (ending September 30, 2022) in the amount of \$323.15 from Best TLC Corporation in Jefferson City, Missouri.

29. Pursuant to a state search warrant, Facebook provided records for profile name "Tre Connor" (account #100069635155059). These records documented the following postings to this account:

- December 20, 2022 at 03:48:56 UTC: Yu won't become wealthy off a 9 to 5 Yu have to become a entrepreneur in som kinda way if yu really want financial freedom .. it's jus a lil riddle we all have the ability to figure out, find a way 🤔🤔🤔
- January 1, 2023 at 04:17:41 UTC: I'm ona brink ima retire in a bank 🏠🤔
- January 16, 2023 at 17:21:36 UTC: Toothpaste, scissors, and alcohol

- January 16, 2023 at 20:10:54 UTC: Shopping all day is one of my favorite hobbies now 🤔🔥
- January 29, 2023 at 22:05:32 UTC: High value men are more rare than beautiful woman, yu can find beauty anywhere, yu not finding a nigga thats attractive plus makes more than 6 figures jus anywhere 100%🤔 https://youtu.be/P4E7UOm_wZY
- January 31, 2023 at 02:25:40 UTC: Get rich' or die tryin 🏠
- February 1, 2023 at 06:01:55 UTC: My New whip finna piss y'all off 🤔🚗👤
- February 1, 2023 at 06:18:16 UTC: I'm grateful my background made me be unqualified to everywhere I applied 🏠 If I conformed an kept tryna work the 9 - 5 society pushes on yu, I'd b broke asf living pay check to pay check .. countless hours of my life not goin towards my purpose 🤔🤔🤔
- February 2, 2023 at 04:53:53 UTC: "I got more 💰 then all ur niggas combined an doubled, tf 🤔🤔🤔 I wish a bih would call me a bum 🤔🤔🤔."
- February 2, 2023 at 06:08:32 UTC: Knowing how to get a lot of money is Masculin, that's why chicks like niggas with money ... it's not the actual money it's the mindset to even be able to obtain that ... that's what they attracted to 100100 oh an the lifestyle 🤔

Brink is a slang term for flipping out in an angry manner. Whip is a slang term for vehicle.

Finna is a slang term for "going to."

30. CONNOR telephoned Zuri Patton, the mother of CONNOR's daughters, on February 25, 2023, while he was incarcerated at the Cole County Jail. In this recorded call, Patton inquired when CONNOR made another Facebook account. CONNOR stated, "aww you talking about the ah... I was using that to get a car..its ah, you talking about the one that says Connect Traye?" CONNOR also stated, "...before I got locked up in here I was using it to get a car because I didn't want them to..ah.. yeah I'm just going to shut the fuck up now, but yeah I was using it to get a car pretty much."

31. On March 15, 2023, Patton reported CONNOR had a Facebook account with the display name Connect Traye.

32. A review of the SUBJECT ACCOUNT on Facebook (www.facebook.com/traye.connor) revealed it displayed the name Connect Traye. The account's cover photo appeared to be a cropped photograph of CONNOR in a boxing ring. The account's profile picture was CONNOR on a beach.

33. Information provided by Facebook documented the SUBJECT ACCOUNT was created June 8, 2020. There were account logins on January 23, 2023, February 1, 2023 and February 2, 2023.

34. On March 15, 2023, an FBI SA served META with a preservation request pursuant to 18 U.S.C. § 2703(f), requiring META to preserve all information associated with the SUBJECT ACCOUNT.

INFORMATION AVAILABLE FROM FACEBOOK

35. META owns and operates Facebook, a free-access social networking website that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

36. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

37. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group

identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

38. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

39. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.

40. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

41. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient’s “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

42. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

43. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

44. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

45. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

46. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

47. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications ("apps") on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

48. Facebook uses the term "Neoprint" to describe an expanded view of a given user profile. The "Neoprint" for a given user can include the following information from the user's profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; pokes; tags; and information about the user's access and use of Facebook applications.

49. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on

Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

50. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

51. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's "Neoprint," IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook

account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner’s state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

52. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

53. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular Title 18, United States Code, Sections 2703(a), (b)(1)(A), and (c)(1)(A), by using the warrant to require META to disclose to the government copies of the records and other

information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

54. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that evidence, fruits, and instrumentalities of violations, or attempted violations, of Sections 2113 and 924(c) may be located in the SUBJECT ACCOUNT described in Attachment A.

55. Based on the forgoing, I request that the Court issue the proposed search warrant.

56. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. Because the warrant will be served on META, who will then compile the requested records at a time convenient to it, there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

Further, Affiant sayeth not.



Sean McDermott
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 41
by telephone on this, the 6th day of June, 2023.



Willie J. Epps, Jr.
United States Magistrate Judge